

IN RE:

CHAPTER 11

PURDUE PHARMA L.P. et al.,
DEBTORS.

CASE NO. 19-23649 (RDD)
JOINTLY ADMINISTERED

CLAIM NO.s 616371
616504
616531

MOTION FOR LEAVE TO FILE LATE PROOF OF CLAIM

AND NOW COMES, LAWRENCE HIGGINS, PLAINTIFF/CLAIMANT IN THE ABOVE CAPTIONED CAUSE AND WOULD SHOW THE COURT THE FOLLOWING:

A) PLAINTIFF FILED PROOF OF CLAIM ON SEPTEMBER 3RD, 2020.

ALONG WITH THIS PROOF OF CLAIM PLAINTIFF ALSO SUBMITTED MOTION FOR LEAVE WITH AFFIDAVIT, TO THE PRIME CLERK.

MOTION FOR LEAVE EXPLAINED HOW PLAINTIFF IS NOW AND WAS INCARCERATED DURING ANY PUBLICIZED EVENTS OF THE LAWSUIT AND GENERAL BAR DATE.

B) PLAINTIFFS CELL BLOCK WAS LOCKED DOWN FROM JANUARY 2020 FOR DISCIPLINARY REASONS. WITH NO ACCESS TO TELEVISION.

TELEVISIONS ARE NOT SOLD TO INMATES IN THE TEXAS PENITENTIARY SYSTEM.

IN MARCH OF 2020, PLAINTIFFS ENTIRE UNIT WAS LOCKED DOWN FOR COVID -19 .

AGAIN THIS IS WITH NO ACCESS TO TELEPHONE OR TELEVISION.

PLAINTIFF ONLY BECAME AWARE OF THE LAWSUIT ON JULY 15, 2020, THROUGH ANOTHER DRUG ADDICT IN PRISON.

PLAINTIFF IMMEDIATELY SENT FOR THE PROOF OF CLAIM FORMS.

THE PRIME CLERK RESPONDED UNTIMELY AND PLAINTIFF DID NOT RECEIVE THE FORMS UNTIL AUGUST 13, 2020, DUE TO THE PRISON MAIL SYSTEM PERSONNEL SHORTAGES AND TDCJ STAFFS SHORTAGES IN GENERAL.

PLAINTIFF IMMEDIATELY COMPLETED THE FORMS AND RETURNED THEM TO THE PRISON MAILING SYSTEM.

THE FORMS WERE NOT RECEIVED BY THE KKERR PRIME CLERK UNTIL SEPTEMBER 3, 2020.

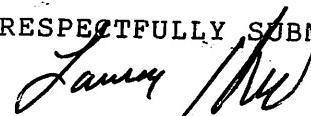
C) PLAINTIFF BEING A LAYMEN OF NEW YORK LAW WAS UNDER THE BELIEF THAT THE PRIME CLERK WAS THE CLERK OF COURT IN THE CAUSE SO ALONG WITH THE COMPLETED FORMS PLAINTIFF SUBMITTED MOTION FOR LEAVE ASKING THE COURTS PERMISSION TO FILE THE LATE PROOF OF CLAIM EXPLAINING WHY PLAINTIFF WAS LATE BY AFFIDAVIT.

PLAINTIFF JUST NOW BECAME AWARE THAT THE MOTION FOR LEAVE WAS NEVER FILED WITH THE PROOF OF CLAIM.

PLAINTIFF BEGS THE COURT TO GRANT THIS MOTION FOR LEAVE BECAUSE THE PLAINTIFF NOT ONLY BECAME ADDICTED TO THESE & OPIODS AND RUIN HIS LIFE, PLAINTIFFS SON JARED JOSEPH HIGGINS BECAME ADDICTED TO OXYCOTIN AND WHEN HE COULDNT GET THE OXY HE TURNED TO HEROIN AND DIED ON DECEMBER 28, 2012 OF AN OVERDOSE AT 29 YEARS OLD, PLAINTIFFS ONLY CHILD...

DUE TO THESE CIRCUMSTANCES PLAINTIFF BEGS THE COURTS PARDON FOR THE TARDINESS AND ASKS THE COURT TO ALLOW THIS CLAIM TO BE CONSIDERED TIMELY FILED. FURTHERMORE THIS TARDINES WAS NOT TO CAUSE THE DEFENDANTS/DEBTORS ANY UNDUE HARM OR DELAY.

RESPECTFULLY SUBMITTED,



SWORN AFFIDAVIT

I, THE UNDERSIGNED HEREBY SWEAR UNDER PENALTY OF PERJURY
THAT ALL FACTS PERTAINED TO IN "PLAINTIFFS MOTION FOR LEAVE
TO FILE LATE PROOF OF CLAIM ARE TRUE AND CORRECT.



LAWRENCE HIGGINS

SWORN AFFIDAVIT II

I, THE UNDERSIGNED HEREBY SWEAR UNDER THE PENALTY OF PERJURY
THAT THIS PLAINTIFF WAS PERSONALLY INJURED BY ADDICTION WHICH
LED PLAINTIFF OUT OF CONTROL.

PLAINTIFF WAS SCARRED EMOTIONALLY FOR LIFE FOR THE LOSS OF JARED.
PLAINTIFF SWEARS UNDER THE PENALTY OF PURGERY THAT BOTH THE
PLAINTIFF AND THE PLAINTIFFS SON BECAME ADDICTED TO OPIOIDS
MANUFACTURED AND DISTRIBUTED BY THE DEBTORS.

SIGNED THIS 21st DAY OF JULY, 2021



LAWRENCE HIGGINS

CERTIFICATE OF SERVICE

PURDUE PHARMA

NO: 19-23649

I, THE UNDERSIGNED HEREBY SWEAR AND CERTIFY THAT A TRUE AND
CORRECT COPY OF PLAINTIFFS MOTION FOR LEAVE TO FILE LAETE CLAIM
WAS SERVED BY PLACING SAME IN THE PRISON MAILING SYSTEM THIS
21ST day of JULY, 2021, to all parties in the cause.


~~LAWRENCE HIGGINS~~

Prime Clerk

Grand Central Station, PO Box 4850
New York NY 10163-4850



U.S. POSTAGE ▶ PITNEY BOWES

 ZIP 10165 \$ 000.50
 02 4W
 000349747 OCT 14 2020

LEGAL NOTICE ENCLOSED. DIRECT TO ATTENTION OF ADDRESSEE OR PRESIDENT / GENERAL COUNSEL.

Notice to Clerk
letter of
his
confirmation of filing
from Sept. 3rd 2020
 Windsor 2325 SRF 46712 MMUD: 11274287 PackID: 110 ClmAckBatch-0379
 Higgins, Lawrence #060189
 1697 FM 980 Huntsville, TX 77343

(Note: letter took total
 4 weeks to
 reach me.)

08 3) 13B

Postmarked October 14

3 months later.

lawyer